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February 6, 2001

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APPLICATION

Honorable Philip N. Asprodites
Commissioner of Conservation
Louisiana Office of Conservation
P. O. Box 94275
Baton Rouge, LA 70804-4275

RE: James Formation, Reservoir B
Converse Field
Sabine Parish, Louisiana

Dear Commissioner Asprodites:

Application is hereby made on behalf of **BRIGHTON ENERGY, L.L.C.** for the calling of a public hearing, after legal notice, to consider evidence relative to the issuance of Orders pertaining to the following matters in the James Formation, Reservoir B, in the Converse Field, Sabine Parish, Louisiana for which rules and regulations and drilling and production units were established by Office of Conservation Order No. 501-B-3, effective May 9, 2000, to-wit:

1. To create three (3) additional drilling and production units of approximately 960 acres each, designated the JA RB SUH, JA RB SUI and JA RB SUJ, for the exploration for and production of gas and condensate;

2. To force pool and integrate all separately owned tracts, mineral leases and other property interests within each proposed unit, with each tract sharing in unit production on a surface acreage basis of participation;
3. To designate a unit well for each of the units proposed herein;
4. To designate unit operators for each of the proposed units;
5. To extend to the proposed units all field rules and other provisions contained in Office of Conservation Order No. 501-B-3, to the extent they are not inconsistent herewith;
6. To consider such other matters as may be appropriate and justified by the evidence presented at the hearing.

The James Formation, in the Converse Field, Sabine Parish, Louisiana, was previously defined in Office of Conservation Order No. 501-B, effective February 1, 1975.

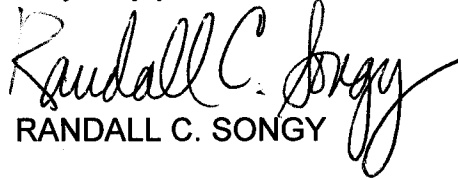
The pre-application conference tentatively scheduled for 11:00 a.m., on Thursday, February 22, 2001, **WILL NOT BE HELD**, as it was not requested within the delays provided for by the Rules of Procedure; therefore, no opposition to this Application at the hearing is anticipated.

Pertinent data relating to the proposed application can be obtained, **AT THE COST OF THE REQUESTING PARTY**, by contacting Leon E. Comeaux & Associates, 305 La Rue France, Lafayette, Louisiana 70508, (337) 233-9839.

There is attached hereto and made a part hereof a plat outlining the proposed units and a list of the names and addresses of the interested parties to whom this unitization proposal is being sent. Pursuant to the Revised Rules of Procedure, such list of parties is being furnished **ONLY** to the Commissioner of Conservation and to the District Manager of the Shreveport District of the Office of Conservation. However, the list of parties will be provided to any party requesting a copy of it. A reasonable effort was made to ascertain the names and addresses of all Interested Owners, Represented Parties and Interested Parties.

Finally, there is also enclosed a check in the amount of \$700.00, made payable to the Louisiana Office of Conservation, in payment of the required hearing application fee.

Very truly yours,


RANDALL C. SONGY

RCS/dde/bad

Enclosures

cc: Mr. Jim Broussard, Shreveport District Manager
Office of Conservation

cc: All Interested Owners, Interested Parties and
Represented Parties

P.S. To all Interested Owners, Represented Parties and Interested Parties:

You may have received this Application even though your property is not included in the proposed unit, because the Revised Rules of Procedure require us to attempt to also notify everyone owning an interest in the area "proximate to" the proposed units. In some cases, the area proximate to proposed units can extend as far as one-half mile outside the unit boundary.

Your receipt of this Application does not require you to take any action. It is meant to notify you of these proceedings so that you have the opportunity to participate if you so desire.

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13 DESOTO PH.

SABINE PH.

T 10 N/R 14 W

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CONVERSE FIELD

T 9 N/R 14 W

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BENSON FIELD

APACHE MARSHALL MATTHEWS "A" #4 9204

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CONVERSE FIELD

APACHE MARSHALL MATTHEWS "A" #3 8425

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CONVERSE FIELD

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